

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
Midland-Odessa Division**

FRANCES ARREDONDO AND  
SAGE COLEMAN

Plaintiffs,

vs.

SCHLUMBERGER LTD. A/K/A  
SCHLUMBERGER TECHNOLOGY  
CORPORATION & ELWOOD  
STAFFING SERVICES, INC.

Defendants.

CIVIL ACTION NO. 7:20-CV-200

**JURY TRIAL DEMANDED**

**PLAINTIFFS' ORIGINAL COMPLAINT AND JURY DEMAND**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, Frances Arredondo and Sage Coleman, and file this Complaint and Jury Demand. Plaintiffs respectfully aver as follows:

**NATURE OF THE ACTION**

This is an action under the Title VII of the Civil Rights Act of 1964, as amended, to correct unlawful employment practices based on unlawful discrimination and retaliation, and to provide appropriate relief to Ms. Frances Arredondo and Ms. Sage Coleman, who were adversely affected by such practices. This suit is also brought to effectuate appropriate injunctive relief to others who may have been affected by Defendants' discriminatory and retaliatory practices and to prevent further occurrence of such practices.

## **JURISDICTION AND VENUE**

1.

The Court has jurisdiction over this matter as Plaintiffs claims arise under a Federal law, Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Sections 2000-e, *et. seq.*

2.

Venue is proper in the Western District of Texas because a substantial part of the events and omissions giving rise to the claim occurred in this judicial district.

## **PARTIES**

3.

Plaintiff, Frances Arredondo, is a person of the full age of majority who resides in Hidalgo County, Texas.

4.

Plaintiff, Sage Coleman, is a person of the full age of majority who resides in Terrobone Parish, Louisiana.

5.

Defendant Schlumberger Ltd d/b/a Schlumberger Technology Corporation (“Schlumberger”) is a foreign corporation with over 100,000 employees worldwide, which operates as a single business enterprise through several wholly owned subsidiaries, including Schlumberger Technology Corporation, and has its headquarters in Houston, Texas.

6.

Defendant Elwood Staffing Services, Inc. (“Elwood”) is an Indiana corporation, with its headquarters in Columbus, Indiana, that provides staffing services in the Western District of Texas to Defendant Schlumberger Ltd d/b/a Schlumberger Technology Corporation.

## STATEMENT OF CLAIMS

7.

During the years 2017 through 2020, Defendants engaged in interstate commerce or in an industry affecting interstate commerce and had 15 or more employees in each of 20 or more calendar weeks.

8.

Frances Arredondo's sex is Female; and Sage Coleman's sex is Female.

9.

Sage Coleman was hired to work for Schlumberger through a job fair held by Elwood at a hotel in Louisiana. There was a large "Schlumberger" sign outside of the event. The people who checked her in at the job fair wore Schlumberger shirts. The only jobs being promoted at the job fair were jobs working for Schlumberger. There was a video describing different jobs available working for Schlumberger. Different jobs depicted in the video required prospects to apply to work through specific staffing services that were hiring for the positions. Ms. Coleman was encouraged to apply for a job in Schlumberger's gun shop in Midland, Texas, which was assigned to Elwood.

10.

Ms. Coleman began working at a Schlumberger facility in Midland, Texas in May 2018. The direct supervisor for her day to day work was Brenda Mitre. Brenda Mitre's boss was Maritza Carrasco, and Ms. Coleman was also expected to answer to Ms. Carrasco as her supervisor. Brenda Mitre and Maritza Carrasco were both Schlumberger employees.

11.

Ms. Coleman was the only African American female working in the gunshop. There were some male workers who were mostly on the night shift. The day shift was almost all Hispanic Female employees.

12.

Over her first three-week work stretch, Ms. Coleman learned that most or all of her female coworkers, including Ms. Mitre and Ms. Carrasco, were gay. She learned this because the women talked about it openly, including gossip about who was having a sexual relationship and who had slept with whom. Ms. Coleman is not gay but has nothing against gay people. She got along fine with everyone and learned how to do her job. She enjoyed the job and worked very hard. She was not disciplined or written up for doing anything wrong. She thought she had found a good thing with the possibility for advancement as she learned new skills.

13.

Right before the end of Ms. Coleman's first three-week work stretch, she was sitting at a worktable with co-workers Lee Thomas and Adriane Colon. Supervisor Brenda Mitre came over and started talking about how she and another female employee had gone out to strip clubs and had sex with some of the same Schlumberger workers. Then Ms. Mitre looked at Ms. Coleman and began to tell the assembled employees how she likes women with big breasts and a big rear end. (Ms. Coleman has both.) Ms. Mitre told Ms. Coleman she liked her women just like her, with big breasts and big rear end. She then asked Ms. Coleman if she was gay. Ms. Coleman told her that she was not gay. In front of the coworkers, Ms. Mitre asked Ms. Coleman again if she was gay and if she would like to try it. Again, Ms. Coleman told her Ms. Mitre that she is not gay, that she had never even thought about trying it, and that she did not want to try it. Then Ms. Mitre asked a third time if Ms. Coleman was sure she was not gay, that there is nothing wrong

with being gay, and questioned was Ms. Coleman sure she did not want to try it. This whole conversation was extremely uncomfortable for Ms. Coleman. She felt like Ms. Mitre was trying to pressure her into sex with her. The fact that Ms. Mitre did it in front of two co-workers made it even more difficult and upsetting. It was like since she was the boss, she did not have to worry about embarrassing or upsetting Ms. Coleman with her repeated sexual advances

14.

During Ms. Coleman's week off back at home, the pressure from Brenda Mitre continued to bother her. She had a great new job with good pay and the opportunity to learn skills that could advance her career. But at the same time, she knew the job came with this sexual pressuring from her supervisor. Ms. Coleman told herself she could ignore it and just focus on the work. She was also looking forward to being switched to the night shift because, prior to the incident at the table with Ms. Mitre, her boss Maritza Carrasco had told her that she would be on the night crew when she returned to Midland. Ms. Coleman knew that there were four men on the night crew and that Ms. Mitre and Ms. Carrasco worked during the day. So, she thought she would be able to mostly avoid being around them, and she hoped the sexual pressure would not be an issue.

15.

When Ms. Coleman got back to Midland, Ms. Carrasco told her that she would be back on the day crew with her. Ms. Coleman was worried that the change was made so that Ms. Mitre could continue the sexual pressure. When Ms. Coleman went to the office to pick up her permanent name badge, she spoke with Schlumberger office administrator Kimberly Mitchum. Ms. Mitchum asked Ms. Coleman if things were going well and whether she had any problems with her co-workers. Ms. Coleman told her that there was an incident that happened between Ms.

Mitre and herself and explained what happened when she was working at the table with Lee Thomas and Adriane Colon. Ms. Mitchum said that what happened was inappropriate and would be considered sexual harassment. She said Ms. Mitre should not have asked her any questions like that. She said she would talk to Shane Morgan, who is the boss over the whole yard.

16.

About two days later, Schlumberger Human Resources showed up at the gunshop to interview the employees. Ms. Carrasco told Ms. Coleman that HR comes to the shop every month or so, just to see how things were going. Ms. Coleman thought it was strange that the day HR came, Ms. Carrasco was taking time to talk to her about the equipment and show her how to use the overhead crane. But the day before HR came, when Ms. Coleman had asked Ms. Mitre or Ms. Carrasco to show her how to use the crane and other equipment, they told her something like, "Oh you won't learn how to use the overhead crane for a while." Ms. Coleman noticed that this was different from the way they treated the Hispanic and gay female co-worker named Frances Arredondo, who had started work the same day Ms. Coleman had. Ms. Carrasco and Ms. Mitre had already taught Ms. Arredondo how to do all sorts of things that they had not showed Ms. Coleman.

17.

When it was Ms. Coleman's turn to talk to the HR person, Ali Mendha, he asked her generally how the job was going and if she had any concerns about the work environment or her bosses. Ms. Coleman explained what happened in the incident at the table with Ms. Mitre. He said, "Wow. That's very inappropriate. I will look into that and take care of it." He said, "Don't worry, everything you say in here is confidential. I took down everything you said."

18.

When Ms. Coleman was finished talking to HR, Ali Mendha told her to tell Ms. Carrasco to send in the next person. So, she left the interview room and went to Ms. Carrasco's office to tell her. When she opened the office door, it looked like they were having a meeting with Ms. Carrasco, Brenda Mitre, Jose Baeza and Antonio Hernandez. Ms. Carrasco told them to leave and asked Ms. Coleman to come inside. When they were alone in her office, she told Ms. Coleman that her boss, Kirsten Denton, and HR asked her to talk to Ms. Coleman. Ms. Coleman asked why. Ms. Carrasco asked her, "Why don't you like gay people? Do you have something against them?" Ms. Coleman asked her what she meant. Ms. Coleman told Ms. Carrasco she does not have a problem with gay people. Ms. Coleman told Ms. Carrasco she was friends with Frances, and Ms. Coleman believed Ms. Arredondo was gay. Ms. Carrasco then told Ms. Coleman, "Well three of the guys told me that you were making gay remarks and you don't like gay people." Ms. Coleman told her she never made any comments about gay people and questioned where Ms. Carrasco got this information because Ms. Coleman generally kept to herself and did not talk to people at work. Ms. Carrasco said that Jose Baeza and Antonio Hernandez told her Ms. Coleman made comments. Ms. Coleman told Ms. Carrasco she hardly ever worked around them and they do not speak to each other. Ms. Coleman pointed out how they work on the other side of the shop and would not be able to hear anything she said. Ms. Carrasco did not try to answer Ms. Coleman and just said, "I don't know, they said you made comments."

19.

At this point, Ms. Coleman realized that Ms. Carrasco and Ms. Mitre were trying to turn the situation around and make it out like Ms. Coleman had caused problems as a response to HR's questions about Ms. Mitre's sexual harassment against Ms. Coleman. Ms. Coleman then

brought up with Ms. Carrasco that she should have addressed the issue with Ms. Mitre sexually harassing her. Ms. Carrasco said she did not feel the need to do so at that time, that was beside the point, which was why doesn't Ms. Coleman like gays. Again, Ms. Coleman explained to Ms. Carrasco that she had nothing against gay people.

20.

After HR came to the shop that day, Ms. Mitre would not speak to Ms. Coleman. At one point, Ms. Carrasco was not in the shop and Ms. Coleman had a question about the guns they were making for a job. So, Ms. Coleman tried to ask Ms. Mitre her question and she turned her back and ignored Ms. Coleman. Ms. Coleman asked her if she heard her, or if she was talking too low. Ms. Mitre then walked away from Ms. Coleman.

21.

In addition to being sexually harassed on the job, Ms. Coleman also had a problem with Ms. Carrasco and Ms. Mitre speaking Spanish and laughing in the shop with some of their favored Hispanic employees. Ms. Coleman had learned in NEST Training that English was supposed to be the primary language used in the shop. She asked Edger Morales if they were talking about the work or the workers, and he said it was a little of both, but mostly talking bad about the employees.

22.

Ms. Coleman was scheduled to stay and work in Midland until flying home on July 4th. The morning of June 28, she received a conformation for a flight home on July 4th. When she got off from work on June 28 at 6:35 p.m., she received an email saying her flight to go home on July 4th was cancelled and her travel arranger had been changed from Jody Tran to Daniel Ennis. Mr. Ennis is over the travel arrangements department. A few minutes later, Ms. Coleman received



an email that she had a flight arranged to go back home on June 29. At this point, Ms. Coleman was thinking it must be a mistake. So, she called Daniel Ennis. He did not answer, so Ms. Coleman sent him a text message. When he called her back, she told him she received an email that her flight had changed and asked if he had made a mistake. He stated that Ms. Coleman needed to call her manger Maritza Carrasco, because she had told him to cancel the flight for July 4 and schedule it for June 29.

23.

Ms. Coleman called Maritza Carrasco as soon as she hung up with Daniel Ennis. She attempted to call twice but got no answer and left her a voicemail. Ms. Coleman sent Ms. Carrasco a text message at 6:57 p.m. telling her that she received an email about her flight being changed and asking her what is going on. Ms. Carrasco replied two hours later stating that Ms. Coleman will need to go ahead and get in touch with the agency about the flight. Ms. Coleman texted her back telling her that it was after hours and Elwood is closed, and asking what she should do. Ms. Carrasco never responded after that. The contact person that Elwood Staffing had assigned to Ms. Coleman - Milae Fish - never answered her phone. So, Ms. Coleman waited until the next day (June 29) to try to contact Elwood staffing. Their office did not open until 9:00 a.m.

24.

Milae Fish returned Ms. Coleman's call on the morning of June 29, and Ms. Coleman told her what happened. Ms. Coleman told her about the sexual harassment from Ms. Mitre and how Ms. Carrasco was telling the lie that Ms. Coleman had made anti-gay comments. Ms. Fish stated she had not received anything from Schlumberger regarding termination, and that Ms. Coleman should go to work. She told her that if she received anything, she would call Ms. Coleman.

25.

Ms. Coleman then went Schlumberger's Midland headquarters where Ali Mendha's office is located to ask him what was going on. She waited for an hour for him. He never came down from his office. He called the receptionist phone and talked to Ms. Coleman from there. He stated he could not talk to her, and that she needed to get in contact with Elwood.

26.

Ms. Coleman went straight from Ali Mendha' office to the Airport because she did not want to miss her flight. She wanted to figure out what was going on, but she was scared that if she missed her flight home, Schlumberger and Elwood would not schedule another one for her. Around 1:00 p.m., Milae Fish called Ms. Coleman back. Ms. Fish told her she received a form for termination. Ms. Coleman asked her if Schlumberger gave a reason why. Ms. Fish stated that they did not have a reason; they just terminated her contract of employment. Ms. Fish said she received a lot of complaints about Schlumberger.

27.

After speaking with Ms. Fish from Elwood, Ms. Coleman called Kimberly Mitchum in Schlumberger's office and told her what happened. Ms. Mitchum stated that she would try to talk to Shane Morgan. Later Ms. Coleman spoke with Ms. Mitchum again and she said that Shane told her it was out of his hands and he could not do anything about the situation. Kimberly Mitchum told Ms. Coleman she should get a lawyer because of the way she was treated and how the Schlumberger people lied on her.

28.

Ms. Coleman got a new job starting August 27th. She had to drive 13 hours from home to get to Midland, Texas for the interview. Then she had to pay for a hotel and living expenses for

10 days before she could start at her new job. She was forced to borrow money for food, gas, and other expenses. Also, her new job was working in the field. It was harder than the work she did for Schlumberger in the gunshop. She worked 14-hour days and there were no clean restrooms in the field, so mostly she just held it until she got back to the hotel room. The weather conditions were very harsh, and she did not get a chance to learn new skills. Also, unlike Schlumberger, there was no pay for travel days and the company did not pay for airline travel to and from Midland. So, when she finished her 14-hour shift, she had to drive all the way home through the night or pay for a hotel room herself. She faced the same issue when she starts each work tour. So, she lost pay and must pay additional expenses associated with her new job. Ms. Coleman was laid off from her job in December 2019, and has been unable to find suitable replacement employment.

29.

After her experience with Schlumberger, Ms. Coleman was very stressed mentally and emotionally. She has had many nights when she could not get any sleep and some days when she just could not get out of bed. She has suffered a loss of appetite, causing weight fluctuation, and regular headaches. She felt completely drained of emotion and when she did not have a job she was constantly worried about how to pay her bills. She had several instances where she found herself crying without knowing why. She has also been frightened to be around or work around women. She is constantly worrying about who is undressing her with their eyes and thinking about her body parts like Ms. Mitre talked.

30.

Frances Arredondo began her employment with Elwood & Schlumberger in April 2018. At the time, she was living and working in Odessa, Texas. She met a man who worked for

Schlumberger in Midland, Texas and he told her about jobs available there and put her in touch with the staffing agency for the job - Elwood. Elwood kept contacting her, and eventually she said she was interested. After that, she received a call from Maritza Carrasco, who is the Schlumberger boss over the gunshop job at the Midland facility, and she scheduled Ms. Arredondo to come to Schlumberger's facility for an interview. At the interview, Ms. Carrasco told Ms. Arredondo about the job in the gunshop and the schedule and told Ms. Arredondo she would make \$18.50/hour plus overtime.

31.

After the interview, Ms. Carrasco came to the HEB where Ms. Arredondo had told her she worked and checked in with her. She also called Ms. Arredondo more than once to check on the status of her application and job offer. Ms. Arredondo never interviewed with anyone from Elwood.

32.

Prior to going to work for Elwood/Schlumberger, Ms. Arredondo was also contacted by Brenda Mitre. At first, Ms. Arredondo did not know who Ms. Mitre was, and Ms. Mitre was text messaging to Ms. Arredondo about doing an Uber ride for her nephew going to work. Then, a few days later, Ms. Mitre called Ms. Arredondo again. (She recognized the phone number.) Ms. Mitre said, "This is Mitre, your new boss. You're gonna be working for me in the shop." She brought up that she was gay and asked Ms. Arredondo if she was gay. Ms. Arredondo told her that she was gay. (This was a very difficult issue for Ms. Arredondo as she was married to a man and has a young daughter, and preferred to keep her sexuality a private matter. She no longer identifies as gay.) Ms. Mitre asked Ms. Arredondo a lot of personal questions like, "What do you like to do for fun?" and "Do you drink?" It was creepy to Ms. Arredondo that her supervisor at a

job she had not even started yet was calling her and asking all these personal questions. She tried many times to end the call by telling Ms. Mitre she had to go, but she kept asking questions. Ms. Arredondo did not want to upset her brand new boss before she started the job, so she put up with the questions and did not tell Ms. Mitre that it was making her feel uncomfortable or hang up on her mid-conversation. The phone call went on for about an hour before Ms. Arredondo was able to get off the phone. Over the next few weeks before she started the job, Ms. Mitre called and texted Ms. Arredondo other times, but she did not respond.

33.

Eventually, Ms. Arredondo got a call from someone at Elwood and was directed to go to their office to take a drug test, and later to an office in Odessa for a physical. On her first day on the job at the Schlumberger gunshop, the only other new employee starting with her was Sage Coleman. When they went into the shop for the first time and Ms. Carrasco introduced them to Ms. Mitre, Ms. Mitre was licking her lips and she gave Ms. Arredondo a creepy look like she was undressing her with her eyes.

34.

Over the first two weeks on the job, Sage Coleman and Frances Arredondo were together pretty much any time Ms. Carrasco and Ms. Mitre allowed it. They worked very well together learning the job and completing the projects much faster than any of the other teams with more experience. Ms. Arredondo stuck close to Ms. Coleman because she was nice, and Ms. Arredondo did not want to be alone around Ms. Carrasco or Ms. Mitre.

35.

Over the first two weeks on the job, Ms. Carrasco was taking the time to talk to Ms. Arredondo and show her more about using the equipment and learning to do the more

complicated work, but not doing the same thing with Ms. Coleman. Ms. Coleman had been working just as hard as Ms. Arredondo and Ms. Arredondo saw no valid reason why she should get preferential treatment.

36.

After the first two weeks on the job, Ms. Mitre sent Ms. Arredondo to work alone in the back of the shop doing modules, which allowed Ms. Mitre to come talk to Ms. Arredondo without Ms. Coleman or anyone else around. Ms. Mitre told Ms. Arredondo that she was trying to keep her in the back of the shop so no one else could talk to her because she "was hers." At that point, Ms. Arredondo did not know what Ms. Mitre meant and she thought she was joking. Ms. Arredondo decided to blow it off and not to make a big deal out of it. While she was working in the back by herself, Ms. Mitre allowed Ms. Arredondo to wear her headphones while other workers were not allowed to wear headphones at work. Ms. Arredondo used the headphones to avoid having to talk with Ms. Mitre.

37.

Ms. Mitre and Ms. Carrasco both made it very clear to Ms. Arredondo that they discriminate against African-Americans. All the African-American men were sent to work out behind the shop doing washing and other manual labor in the heat. They only liked one African-American man who had crushed a finger on the job and had to work inside. They talked about how they did not like any of the African-American workers. One African-American man quit his job and called Ms. Carrasco a racist because she kept assigning him to do the hard jobs out back. They were talking about it afterward and said it was not racism because they assign everyone to work out back. But that was not true. Ms. Arredondo volunteered to go work out back and they refused to let her. They both would say things like, "We never had all these issues until these

black people came in from Louisiana." All of this was hurtful to Ms. Arredondo because her mother who adopted her is African-American. Ms. Arredondo could not stand to listen to the racist talk and so she told Ms. Mitre and Ms. Mitre was stunned.

38.

During Ms. Arredondo's third week on the job, Sage Coleman was off and back home in Louisiana. Ms. Arredondo was still living on the Schlumberger Signor Camp. Ms. Mitre started inviting her to lunch every day. She agreed to go to lunch with Ms. Mitre and another coworker named Beyonce. The lunch was very uncomfortable. Ms. Mitre was giving Ms. Arredondo the come-on looks again with the licking and biting her lips. When Beyonce was not looking, Ms. Mitre told Ms. Arredondo to touch her leg and hold her hand. This was unwelcomed to Ms. Arredondo, but she was afraid to reject Ms. Mitre because it seemed clear to Ms. Arredondo that Ms. Mitre already knew she did not want to be with her sexually because she had been avoiding her since even before she got on the job. So, for Ms. Mitre to continue to pressure Ms. Arredondo made it seem to Ms. Arredondo that Ms. Mitre did not really care if Ms. Arredondo wanted to be with her or not. Ms. Arredondo was afraid that if she rejected Ms. Mitre it would hurt her job. After the first time Ms. Arredondo went to lunch with Ms. Mitre and Beyonce, they asked her to go again. Ms. Arredondo tried to say no and used an excuse that she did not have her purse with her. They kept pushing and Ms. Arredondo felt she had to say yes. When they were at lunch, Ms. Mitre did the same thing to Ms. Arredondo. After that day, Ms. Arredondo tried many other times to say no to the lunch invitations, but Ms. Mitre would get angry and pressure her: "Well you don't want to go anywhere. You don't want to do anything ... " When she was mad

at Ms. Arredondo for rejecting her advances, Ms. Mitre made work difficult by hanging around in the back where she had assigned Ms. Arredondo to work alone and giving her nasty looks and generally being mean.

39.

One day, after Sage Coleman came back to work following her week off, Ms. Mitre, Ms. Carrasco and Ms. Arredondo went to McCallister's to eat. Ms. Mitre made sure to sit next to Ms. Arredondo and she tried to hold her hand under the table. Ms. Arredondo tried to physically push Ms. Mitre away from her at the restaurant. Whenever she did something like that to defend herself against Ms. Mitre's unwanted sexual advances or somehow show that they were not a couple in front of Beyonce, Ms. Mitre would pinch Ms. Arredondo or do something like that to keep her in line.

40.

After lunch, Ms. Arredondo saw Sage Coleman and some of the other employees sitting at the table in the front of the shop eating their lunch. Someone made a joke that they were all at the table together because they were not part of the clique since they were not gay or Hispanic. Ms. Arredondo heard one of the men said it. But later, when HR came to investigate, Ms. Mitre and Ms. Carrasco forced Ms. Arredondo to give a statement saying that Ms. Coleman had made that statement.

41.

Before Sage Coleman had left for her off-week, she had told Ms. Arredondo about the incident with Ms. Mitre at the table repeatedly asking her if she was gay and if she wanted to try being gay. Ms. Coleman believed that Ms. Arredondo was gay, and Ms. Coleman had never given Ms. Arredondo any signs that she had a problem with gay people. When Ms. Coleman had



told Ms. Arredondo about the incident with Ms. Mitre, Ms. Coleman was upset, and told Ms. Arredondo that Ms. Mitre was wrong to do that to her at work, that she did not want that attention, and that she just did "not roll that way." Ms. Arredondo understood how Ms. Coleman felt.

42.

When HR showed up at the shop asking questions sometime after Ms. Coleman returned from her week off, Ms. Coleman told Ms. Arredondo how she had complained to Kim Mitchum in the office about the incident with Ms. Mitre. They figured that HR was there because Kim Mitchum had told them about Sage's complaints. On the day HR came, Ms. Carrasco acted nice to Ms. Coleman and was giving her some instruction on how to operate the overhead crane - something they had showed Ms. Arredondo weeks earlier. But then HR left, and Ms. Carrasco got everyone to leave the area and left Ms. Coleman alone trying to operate the crane. Ms. Arredondo thinks this was a way for Ms. Carrasco and Ms. Mitre to show Ms. Coleman that complaining to HR was not going to help her.

43.

Before Ms. Arredondo was called in to talk to HR, Ms. Mitre told her what she had to say. Ms. Mitre told Ms. Arredondo that she had to tell HR that she heard Ms. Coleman say that she was sorry she was not part of the "in" crowd because she was not Mexican or gay. Right after Ms. Mitre explained that to Ms. Arredondo, she brought her to Ms. Carrasco and told her that Ms. Arredondo needed to tell her what she heard. Ms. Arredondo knew it was wrong to lie, but she felt scared and under pressure from Ms. Mitre. She knew that Ms. Mitre would make her job and life miserable if she challenged her, and she felt powerless to resist with both Ms. Mitre and

Ms. Carrasco there waiting for her to say what Ms. Mitre told her to say. So, she told Ms. Carrasco that Ms. Coleman had made the comment about gays.

44.

When Ms. Arredondo was on her days off, Ms. Mitre called her to tell her that Sage Coleman was fired, and that Ms. Arredondo would have to give a written statement when she returned to work. Ms. Mitre told Ms. Arredondo that she had to say the lie about Sage making a comment about gay people. Ms. Arredondo told Ms. Mitre that she did not want to give that statement. Ms. Mitre told Ms. Arredondo that if she did not give statement she wanted her to give, then Schlumberger would fire her for lying because she was not telling the same story she had told Ms. Carrasco. When Ms. Mitre and Ms. Arredondo were discussing Sage Coleman's complaint to HR, Ms. Mitre did tell Ms. Arredondo, "I would pay attention to that black bitch" (meaning she would be interested in sex with her).

45.

When Ms. Arredondo got back from off days, she had to meet with Ali Mendha in HR. He read his notes supposedly saying what Ms. Carrasco had told him about what Ms. Arredondo told her about Ms. Coleman making the comment. Ms. Arredondo feared that if she did not repeat the lie and tried to explain how Ms. Mitre was making her lie, she would lose her job. So, she gave them the statement they wanted. Ms. Arredondo was upset about having to lie about Ms. Coleman.

46.

After Ms. Coleman was fired, Ms. Arredondo had no protection from Ms. Mitre and things got even worse. On or about June 15<sup>th</sup>, Ms. Arredondo was the designated driver for a group of the women going to a party at some place in Odessa called Corona's Sports Bar. Ms.

Mitre had been following her around work all day trying to flirt and saying she wanted to be with Ms. Arredondo. At the Sports Bar place, while Ms. Arredondo was waiting in a little hallway outside the restroom, Ms. Mitre forcefully kissed Ms. Arredondo with her tongue against her will. Around this time, Ms. Arredondo was also noticing that Ms. Carrasco seemed to have some sort of girlfriend relationship with Ms. Mitre. Ms. Arredondo was afraid that Ms. Carrasco would think that she wanted this attention from Ms. Mitre and be angry with her for being with her girlfriend.

47.

On or around June 23rd, Ms. Arredondo was finished with work and needed to get back to the camp. Ms. Mitre offered her a ride to the camp, and she accepted since otherwise she would have had to wait for another ride and she wanted to get back to the camp after the work day. Once she was in the car, Ms. Mitre took Ms. Arredondo to eat even though she told her she just wanted to go to the camp. Ms. Mitre threatened that if Ms. Arredondo told anyone anything about her, she would make sure Ms. Arredondo lost her job, and everybody would think Ms. Arredondo is a whore. Ms. Mitre pressured Ms. Arredondo to have a drink with her, and she had one drink. (Ms. Mitre would drink alcohol every day at breaks and during lunches.)

48.

After they left the restaurant, Ms. Arredondo's memory of what happened next is fuzzy. One drink should not have made her drunk at all, but she felt very weird and passed out during the car ride. She remembers Ms. Mitre said she was taking her back to the camp, but she woke up in the car at Ms. Mitre's house. Ms. Arredondo told her she wanted to go back to the camp, but she brought her inside. Ms. Arredondo was still very woozy. Ms. Arredondo remembers Ms. Mitre taking a phallic sex toy out of her drawer. Ms. Arredondo remembers Ms. Mitre saying

repeatedly, "Wake up. You're not that drunk." Ms. Arredondo passed out and does not really know what happened when she was out. She woke up before sunrise the next morning at Ms. Mitre's house with no clothes on and feeling very foggy brained. Her head was pounding, and her mouth was very dry. She felt very tired and just wanted to pass out again. Ms. Carrasco was calling Ms. Arredondo's phone and Ms. Mitre's phone because they were supposed to be at work. Ms. Arredondo did not want Ms. Carrasco to know she had been with Ms. Mitre, so she told her that she was back at the camp because she had drunk a few too many with the guys. After this incident, Ms. Mitre was mean and nasty to Ms. Arredondo.

49.

A few days later, Ms. Arredondo went home on some off days. Ms. Mitre kept calling and texting her. Ms. Arredondo mostly did not answer. One time she answered, and Ms. Mitre was angry. She said, "You better answer my calls if you know what's good for you."

50.

When Ms. Arredondo got back to work, Ms. Mitre told her that Schlumberger was sending her to Kellyville Oklahoma for training and she wanted to go to dinner before she left. Ms. Arredondo told her no. Ms. Mitre said, "You know you need to go. If you thought I treated you like shit before, just don't show up and you'll see." So, Ms. Arredondo met Ms. Mitre for dinner at the Olive Garden. When they went inside Ms. Mitre was trying to hold Ms. Arredondo's hand and kiss her. Ms. Arredondo tried to stop her and demanded that she sit on the other side of the table. Ms. Mitre told her that it was okay to date co-workers, that they would not get in trouble. Ms. Arredondo told her that was not the issue; she just did not want to date Ms. Mitre and there was nothing there between them. Ms. Mitre got mad and started looking at her phone during the dinner. But when Ms. Arredondo was leaving, Ms. Mitre got in between her

and her car and wanted a kiss. Ms. Arredondo tried to avoid it. Ms. Mitre said, "I get the feeling you don't want to be with me." In her mind, Ms. Arredondo was like, "Finally." But Ms. Mitre already knew that Ms. Arredondo did not want to be with her, and Ms. Mitre was trying to show Ms. Arredondo that her feelings did not matter because Ms. Mitre was going to get what she wanted.

51.

After that night, Ms. Arredondo decided to report the sexual harassment from Ms. Mitre. She went to Ms. Carrasco and explained that she was not dating Ms. Mitre, that she did not want to be with Ms. Mitre, and that Ms. Mitre had been pressuring her and forcing herself on her. Ms. Carrasco's response was to be angry with Ms. Mitre because she and Ms. Carrasco were in a relationship. Ms. Carrasco said, "Oh my god, I can't believe she did this to me." Ms. Carrasco was more concerned about Ms. Mitre being unfaithful to her than she was about the unlawful sexual harassment and assaults Ms. Arredondo was facing from her supervisor. Ms. Carrasco told Ms. Arredondo that she should go home and take two weeks off and Ms. Carrasco would take care of it. Ms. Carrasco told Ms. Arredondo not to go to HR. Ms. Arredondo told Ms. Carrasco that she did not want to lose a whole week's worth of pay taking an extra week off. Ms. Carrasco said she would make sure Ms. Arredondo got paid for the first week off, but warned Ms. Arredondo that if she told anyone, she would deny it.

52.

Ms. Arredondo went home for two weeks and came back hoping things would be different. When Ms. Mitre returned to the gunshop from her training in Oklahoma, she was showing off a big hickie on her neck and acting all mean - especially to Ms. Arredondo. Ms. Arredondo was trying to do her job and with her coworkers looking on, Ms. Mitre came right up

to Ms. Arredondo with her finger pointed right in her face and yelled, "You better take my name out of your f[]ing mouth" and all sorts of nasty things in an effort to make it look like Ms. Arredondo had been chasing after sex with Ms. Mitre. Ms. Mitre yelled, "You are fucking disgusting. You are a walking STD." Ms. Arredondo tried to just keep working but could not hold back and told Ms. Mitre to "leave [her] the f[] alone." Then Ms. Mitre left for a little while and came back with a cup in her hand, saying, "Don't be putting your f[]ing stuff in my f[]ing locker you whore." Again, it was all made up. It was not Ms. Arredondo's cup. Ms. Arredondo did not leave things in Ms. Mitre's locker. Ms. Arredondo never wanted anything to do with Ms. Mitre. Ms. Mitre was trying to make it look to co-workers like they had a consensual relationship when that was not true.

53.

The harassment kept going all day long after that and Ms. Arredondo just could not take it. She told Ms. Carrasco that she could not handle it and that she was going to quit. Ms. Carrasco kept telling Ms. Arredondo, "Don't go to HR. I'm going to lose my job. You are going to lose your job." Ms. Arredondo went back to the camp and packed her things and went home. At that point, she figured she no longer had the job. After being home for a few days, she called Ms. Carrasco. Ms. Carrasco told Ms. Arredondo that she still had a job if she wanted it, but she just could not call HR, that she would take care of it.

54.

Ms. Arredondo tried coming back as Ms. Carrasco had asked. Ms. Arredondo really wanted to make the extra money she was making on the Schlumberger job compared to all her previous jobs. When Ms. Arredondo got back, Ms. Mitre was just as ugly as before. Ms. Mitre would yell at Ms. Arredondo and always assigned her to work the pipe wrench part of the

assembly. This was the most physically demanding assignment in the shop and usually one of the men did it or they switched off, so no one would get worn out. On the third day of being treated like this, Ms. Arredondo decided to talk to Ms. Mitre. Ms. Arredondo told Ms. Mitre that she was the one who started all the problems with her and that she did not have to treat her this way. Ms. Mitre responded by telling Ms. Arredondo that she should not have told Ms. Carrasco. At that point, Ms. Arredondo told Ms. Mitre and Ms. Carrasco that she was done with them and she was going to HR. Ms. Carrasco begged Ms. Arredondo not to do it. Ms. Carrasco told Ms. Arredondo that she would make sure that Ms. Mitre did not tell her what to do, that all Ms. Arredondo's orders would come from Ms. Carrasco or someone else. Ms. Carrasco begged Ms. Arredondo to try it out. Ms. Arredondo asked Ms. Carrasco to send her to work in the field and Ms. Carrasco told her, "No. You are a girl. You cannot make it in the field." So, Ms. Arredondo tried Ms. Carrasco's plan, but before the end of the day Ms. Mitre came back and started yelling at Ms. Arredondo, supposedly for something they were all doing with the gun assembly.

55.

At this point, Ms. Arredondo was close to having another anxiety attack at work, and she decided she had to quit. She went to Grace in the Schlumberger office and told her she was quitting. Schlumberger had just had a 3-hour class on professionalism and harassment for all the employees in the shop. Ms. Arredondo told Grace that she was quitting because of what she had learned in the class. Grace said she did not want any details, that HR would do an exit interview, just for Ms. Arredondo to turn over her badge.

56.

After she left Schlumberger, Ms. Arredondo called Elwood and talked with Milae Fish to tell her why she had to quit. Ms. Arredondo was trying to tell her and crying, and when she told

Ms. Fish she was sexually harassed and assaulted, Ms. Fish said, "Oh no. Not again." Ms. Arredondo asked her what she meant, and Ms. Fish said that it was not the first or second time that she has had that problem coming from the shop. She asked Ms. Arredondo to give a written statement. Ms. Fish called and texted Ms. Arredondo asking for a statement several times. But Ms. Arredondo was so upset and unable to function that she just did not have the strength to do it. Every time she thought about writing the statement, Ms. Arredondo would think about what happened at Schlumberger and start crying.

57.

The whole experience of working for Elwood and Schlumberger was extremely hard on Ms. Arredondo emotionally. When she started work there, she hardly ever drank or smoked a cigarette. But by the time she left, drinking and smoking was an everyday thing. She was having anxiety attacks at work. She got a prescription for Xanax. After she left the job, she could not stay by herself in Odessa and moved back to Edinburg, Texas to be close to her mother, daughter and ex-husband.

58.

As a result of the conduct of Defendants described above, Ms. Arredondo has had trouble sleeping at night. Her mind keeps flashing back to different parts of what happened to her with Ms. Mitre and Schlumberger. She went to see a doctor and get more Xanax, but after the termination, she had no health insurance, so she had to drive 2.5 hours to Mexico to see the doctor, and she could not go to regular therapy appointments there. As a result of the conduct of Defendants described above, Ms. Arredondo feels hopeless and worried that she may never recover. Before this all happened, she was an outgoing person who saw the good in people and did things like mow lawns for veterans and disabled people who could not mow themselves.



After the events described above, she was not motivated at all to go out and meet or do things for strangers. She is afraid of people trying to take advantage of her.

59.

Defendants Schlumberger and Elwood were Ms. Coleman's and Ms. Arredondo's "employers" under Title VII. Alternatively, Schlumberger and Elwood were Plaintiffs' joint employers.

60.

Defendants Schlumberger and Elwood violated Title VII by creating a hostile work environment with unwelcome conduct against Plaintiffs and other employees based on sex, race, and national origin. Defendant's harassing conduct was severe and pervasive and created a work environment that was intimidating, hostile and abusive to Plaintiffs based on sex, race, and national origin.

61.

Defendants Schlumberger and Elwood violated Title VII by intentionally discriminating against Plaintiffs because of their sex and retaliating against Plaintiffs because of their good faith allegations of discrimination in the workplace.

62.

Defendant Elwood knew or should have known of the illegal harassment, discrimination, and retaliation described above, but failed to take prompt and appropriate remedial action to protect Plaintiffs from the illegal conduct.

63.

Defendant Elwood knew about the problems with illegal discrimination and retaliation against employees it sent to work for Schlumberger in Midland, Texas, but it intentionally

ignored this information and conspired with Schlumberger to discriminate and retaliate against Plaintiffs.

64.

Despite the fact that Defendant Elwood knew or should have known about the illegal treatment of Plaintiffs, Elwood relied on Schlumberger's decision to fire Sage Coleman and did not do any independent investigation into the reasons, legal or illegal, behind the decision to terminate its employee.

65.

As a result of the Defendants' illegal actions, Plaintiffs have suffered significant harm, including lost wages and benefits, mental anguish, emotional distress, inconvenience, loss of enjoyment of life, and embarrassment.

66.

The unlawful practices complained of above were intentional.

67.

The unlawful practices complained of above were done with malice or reckless indifference to the federally protected rights of Plaintiffs.

68.

Copies of the EEOC's Right to Sue letters, issued to Plaintiffs on May 12, 2020, are attached as Exhibit A - D to Plaintiffs Complaint.

JURY DEMAND

69.

Plaintiffs demands a jury trial on all triable issues of fact.

PRAYER FOR RELIEF

70.

Wherefore, Plaintiffs respectfully requests that this Court:

- A. Grant a permanent injunction enjoining Defendants, their officers, successors, assigns, and all persons in active concert or participation with them, from engaging in unlawful retaliation against employees who complain about sex, race, or national origin discrimination and removing them from “no-rehire” status;
- B. Order Defendants to institute and carry out policies and procedures which safeguard all employees, regardless of sex, against unlawful sex, race, and national origin based harassment and retaliation, provide equal employment opportunities for all individuals, and which will eradicate the effects of its past and present unlawful employment practices, including but not limited to: training of personnel concerning compliance with Title VII, requiring Elwood to perform independent investigations of all employee discrimination, harassment and retaliation complaints by employees assigned to Schlumberger, and ordering Schlumberger to cooperate in these investigations by providing access to all relevant witnesses, documents, and other materials;
- C. Order Defendants to make Plaintiffs whole by providing compensation for past and future nonpecuniary losses resulting from the unlawful practices complained of above, including but not limited to emotional and mental anguish, pain and suffering, humiliation, loss of enjoyment of life, and devastation in amounts to be determined at trial, and by providing compensation for past and future pecuniary losses resulting from Defendants’ unlawful practices;

- D. Order Defendants to pay punitive damages for their intentional and reckless conduct, as described above, in amounts to be determined at trial;
- E. Order Defendants to pay Plaintiffs reasonable attorney's fees;
- F. Grant such further legal or equitable relief as the Court deems necessary and proper; and award Plaintiffs their costs of this action.

Date: August 10, 2020

Respectfully submitted,

/s/ JT Morris

JT Morris  
Texas State Bar No. 24094444  
jt@jtmorrislaw.com  
JT Morris Law, PLLC  
1105 Nueces Street, Suite B  
Austin, Texas 78701  
Telephone: (512) 717-5275  
Fax: (512) 582-2948

Justin E. Alsterberg (Motion to be admitted  
pro hac vice forthcoming)  
La. Bar No. 31015  
STERNBERG, NACCARI & WHITE, LLC  
935 Gravier Street, Suite 2020  
New Orleans, Louisiana 70112  
Telephone: 504.324.2141  
Facsimile: 504.534.8961  
ja@snw.law

Counsel for Plaintiffs